



Unifying the care experience.

Modern Slavery Policy

Version	1.0
Date of Version	23/06/2021
Created By	Lorraine Morrin
Approved By	James Fitter
Confidentiality Level	TLP:Green



Disclaimer: By using this document and associated products, you are deemed to have agreed to the following terms. If you disagree with any of these terms, please do not use this document or associated products. All the material in this document is solely for educational and informational purposes. This document is not meant to be used, nor should it be used, to provide a single or a definitive solution for any IT environment. Any policies or standards internally adopted by you may override what is stated in this document, and if in doubt, technical advice should be sought directly with Oneview Limited. The information in this document is true and complete to the best of our knowledge. While all attempts have been made to verify the accuracy of the information provided in this document, Oneview Limited assumes no responsibility for any error or omissions. The information provided herein is provided "as is" and you read and use this information at your own risk including the use of links to external websites, and to the fullest extent permitted by law. Oneview Limited excludes all implied terms, conditions, warranties or representations regarding this document arising by law or otherwise. Oneview Limited disclaims any liability for any incidental, consequential, indirect, special or punitive damages or losses, any direct or indirect loss of profits, or any lost savings, loss of use or loss of data arising out of or related to the use of the information contained in this document and /or the use of any associated products.

Change History

Date	Version	Created By	Description of Change
23/06/2021	0.1	Lorraine Morrin	Initial version
02/07/2021	1.0	Lorraine Morrin	Changes reviewed and finalized

Table of Contents

Contents

MODERN SLAVERY POLICY	0
INTRODUCTION	3
POLICY STATEMENT	3
RESPONSIBILITY FOR THE POLICY	3
COMPLIANCE WITH THE POLICY	4
COMMUNICATION AND AWARENESS OF THIS POLICY	5
BREACHES OF THIS POLICY	5

Introduction

This modern slavery policy is designed to assist Oneview to comply with the Modern Slavery Act 2018 (NSW) and the Modern Slavery Act 2018 (Cth). The policy sets out Oneview's expectations for its workers, contractors, suppliers, distributors and other business partners regarding modern slavery. It also sets out measures taken by Oneview to address modern slavery in its business and supply chains.

Policy Statement

- 1.1 Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains (to the best of our ability).
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian modern slavery legislation. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The board of directors is also responsible for approving our annual modern slavery

statement and ensuring that it complies with our disclosure obligations under Australian modern slavery legislation.

- 2.2 The global leadership team has appointed Sarah Ryan, Business Transformation Manager as having primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. As compliance manager, Sarah Ryan's responsibilities extend to:
- (a) monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under Australian modern slavery legislation, including in our subsidiary organisations;
 - (b) monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
 - (c) developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
 - (d) monitoring the effectiveness of those measures;
 - (e) developing appropriate training materials and programs for our employees to comply with this policy; and
 - (f) preparing our annual modern slavery statement in accordance with our disclosure obligations under Australian modern slavery legislation.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.
- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Sarah Ryan, Compliance Manager.

Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify the Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or PeopleOps or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Compliance Manager.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our reporting procedure which can be found in your community guidebook, on our internal intranet or on our website.

Communication and awareness of this policy

- 4.1 We will provide regular training to all our employees on this policy. This will include training on how to identify modern slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of modern slavery practices. This training will also form part of the induction process for all individuals who work for us, whether as an employee or a contractor.
- 4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or serious misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.